

# EXHIBIT E

Coalition for Good Governance, et al.

*Plaintiff*

v.

Brad Raffensperger, et al.

*Defendant*

Civil Action No.1:17-cv-2989-AT

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Cynthia Willingham, Supervisor of Elections, Rockdale County

**DOCUMENTS TO BE PRODUCED**

**Please note: all document references are to the November 6, 2018 election unless otherwise noted.**

1. Electronic copy of the GEMS Databases for the November 6, 2018 election received from the Secretary prior to such election. Include any passwords necessary to access the databases.

**BOARD OF ELECTIONS RESPONSE: This is an objection to the request for copies of GEMS Database with password. Releasing a copy of this Database and password, with no restrictions on its use, would jeopardize the security of all future elections, in that the password and information contained on the Database would expose Rockdale County's Election System to greater harm, including security breaches. Please contact my Attorney, Qader Baig, (770) 929-1665.**

2. Electronic copy of the completed GEMS Databases transmitted to the Secretary at the close of the November 6, 2018 election. Include any passwords necessary to access the databases. (If no database was transmitted to Secretary of State, provide final post-certification GEMS Database.)

**BOARD OF ELECTIONS RESPONSE: This is an objection to the request for copies of GEMS Database with password. Releasing a copy of this Database and password, with no restrictions on its use, would jeopardize the security of all future elections, in that the password and information contained on the Database would expose Rockdale County's Election System to greater harm, including security breaches. Please contact my Attorney, Qader Baig, (770) 929-1665.**

3. Electronic copy of the GEMS Database backup created closest in time to 11 :59pm November 6, 2018.

**BOARD OF ELECTIONS RESPONSE: This is an objection to the request for copies of GEMS Database with password. Releasing a copy of this Database and password, with no restrictions on its use, would jeopardize the security of all future elections, in that the password and information contained on the Database would expose Rockdale County's Election System to greater harm, including security breaches. Please contact my Attorney, Qader Baig, (770) 929-1665.**

4. Polling place DRE Recap sheets from all voting locations for Election Day.

**BOARD OF ELECTIONS RESPONSE: See Item Labeled 4.**

5. Logic and Accuracy Testing results reports and summaries, and all exception reports for DRE machine testing for the November 6, 2018 election.

**BOARD OF ELECTIONS RESPONSE: See Item Labeled 5.**

6. Electronic copy of DRE machine poll results tapes generated at close of polls on November 6, 2018 from polling places listed below:

Milstead  
Barksdale

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled 6.

7. Electronic copy of the audit log (system logs) for GEMS server from date the November 6, 2018 election was initiated through December 31, 2018.

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled 7.

8. Documentation of the DRE electronic ballot content for each ballot style for the November 6, 2018 election.

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled 8.

9. Documentation of the DRE ballot layout for each ballot page and each type of DRE equipment and method of voting for the November 6, 2018 election.

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled 8.

10. The document containing the listing of early voting locations for the November 8, 2016 and the November 6, 2018 elections.

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled 10.

11. The inventory listing of all Ballot on Demand printers in service.

**BOARD OF ELECTIONS RESPONSE:** Rockdale County does not have Ballot on Demand Printers.

12. Copies of all post-election audit reports, audit adjustments, reconciliations and reviews of polling place records and summary records.

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled 12 and also see DRE Recap Sheets from Item Labeled 4.

13. Copies of all analysis of results generated by you including analysis of undervote rates.

**BOARD OF ELECTIONS RESPONSE:** No analysis exist.

14. Copies of documentation regarding all discrepancies in vote tallies detected at any level of reporting.

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled 12 and see DRE Recap Sheets from Item Labeled 4.

15. Voter complaints related to difficulty voting in the Lt. Governor's contest.

**BOARD OF ELECTIONS RESPONSE:** No complaints were received regarding Lt. Governor's race.

16. All documents reflecting communications subsequent to July 1, 2018 between you and any person concerning the following topics:

a. A new voting system for Georgia

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled \_\_\_\_.

b. A pilot program for the new voting system;

**BOARD OF ELECTIONS RESPONSE:** Rockdale County does not have any communications subsequent to July 1, 2018.

c. The undervotes in the Lt. Governor's race in the November 2018 election;

**BOARD OF ELECTIONS RESPONSE:** Rockdale County does not have any communications subsequent to July 1, 2018.

d. Election voting system-related provisions of House Bill 316 (2019);

**BOARD OF ELECTIONS RESPONSE:** Rockdale County does not have any communications subsequent to July 1, 2018.

e. Voting system irregularities, operational problems, computer-related malfunctions; and

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled 16e.

f. Ballot images as public records

**BOARD OF ELECTIONS RESPONSE:** See Item labeled 8. Documentation is same as Item Labeled 8.

17. All documents reflecting communications between the county elections director and the Secretary of State's office related to or regarding the GEMS database for the November 6, 2018 election.

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled #17.

18. DRE memory cards (or complete electronic copies) for voting machines used at the following polling places:

Barksdale

Milstead

**BOARD OF ELECTIONS RESPONSE:** This is an objection to the request for Memory Cards. Releasing these cards, with no restrictions on its use, would jeopardize the security of all future elections, in that the password and information contained on the Database would expose Rockdale County's Election System to greater harm, including security breaches. Please contact my Attorney, Qader Baig, (770) 929-1665.

19. All DRE memory cards (or complete electronic copies) last used during the November 2018 election (that is, not used subsequent to the November 6, 2018 election).

**BOARD OF ELECTIONS RESPONSE: BOARD OF ELECTIONS RESPONSE:** This is an objection to the request for Memory Cards. Releasing these cards, with no restrictions on its use, would jeopardize the security of all future elections, in that the password and information contained on the Database would expose Rockdale County's Election System to greater harm, including security breaches. Please contact my Attorney, Qader Baig, (770) 929-1665.

20. Cast vote records for first 5 ballots cast and last 5 cast at early voting center county election office.

**BOARD OF ELECTIONS RESPONSE:** Rockdale County has no way to determine the order a ballot was cast on a DRE. Ballots cast are not recorded in the order they were cast.

21. Cast vote records for first 5 ballots cast and last 5 ballots cast on election day at Milstead precinct.

**BOARD OF ELECTIONS RESPONSE:** Rockdale County has no way to determine the order a ballot was cast on a DRE. Ballots cast are not recorded in the order they were cast.

22. An electronic copy of the database used to configure the ES&S ExpressVote voting machines and the tabulation server in the November 2017 Conyers municipal election.

**BOARD OF ELECTIONS RESPONSE:** Rockdale County does not have a copy of the Database. This election was conducted under a Pilot and the Database was created by ES&S.

23. A copy of all user manuals, operators' guides, system guides and technical manuals for the ES&S voting system used in the November 2017 Conyers municipal election.

**BOARD OF ELECTIONS RESPONSE:** See Item Labeled 23.

24. Documentation related to the application of unique identifiers on electronic ballots.

**BOARD OF ELECTIONS RESPONSE:** Rockdale County has not documentation relating to the application of unique identifiers on electronic ballot.